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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the matter of)
)
Amendment of Section 73.202(b)) RE: MM Docket No. 93-236
Table of FM Allotments) RM-8306
Tulelake, California)

COMMENTS IN SUPPORT OF DOCKET 93-236

TULELAKE, CALIFORNIA UPGRADE

Comes now, Wynne Broadcasting Company, Inc. the permittee of KFLS-FM (the petitioner) respectfully pleads the Commission institute MM-Docket 93-236 as proposed to change the FM tables of allotments Section 73.202(b) of the Commission's rules to amend the FM Table of allotments as follows:

<u>CITY</u>	<u>EXISTING</u>	<u>PROPOSED</u>
Tulelake, California	243 C2	243 C

In Support whereof the following is shown:

1. Wynne Broadcasting Company, Inc., Permittee of radio station KFLS (FM), seeks to upgrade KFLS (FM) class of operation to C standing from the petitioners current transmitter site to provide Tulelake and the surrounding areas of Siskiyou County in California with a improved level of service to the public. The petitioner pleads the Commission issue KFLS (FM) a new class C allocation and modify KFLS (FM) station license consistent with the petitioners request.

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2. The attached engineering report and spacing study shows that the upgrade as proposed using the current transmitter site (42:05:50 N, 121:37:59 W) will conform with current FCC spacing requirements (73.207), ownership rules, and that there are no other petitions or application that conflict with this rulemaking request (see exhibit E-1 attached).

3. The petitioner believes that there would be great public benefit if the commission should grant this upgrade request. If granted, KFLS (FM) will provide a improved level of service to the Siskiyou County, Modoc County in California and Klamath County in Oregon.

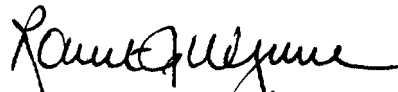
4. The petitioner, with no undue delay, will apply for and will construct transmission facilities fully consistent with this rulemaking request, if granted.

In conclusion, Wynne Broadcasting Company, Inc. pleads the Commission Allot FM channel 243 C to Tulelake, California for use by radio station KFLS (FM) from the petitioners current transmitter site and that the Commission, if approving the petition, will modify KFLS (FM) current license consistent with the new channel and power level.

Prepared by:
David Quinlan, consultant
222-B Elm Ave.
Manteca, CA 95336
(209) 825-6854

The undersigned verifies that, to the best of his knowledge, the information contained in these comments, and in the petition for rulemaking previously submitted, are correct, complete and are fully consistent with current commission rules and policies.

Respectfully submitted:



Robert Wynne, President
Wynne Broadcasting Company, Inc.
1338 Oregon Ave.
P.O. Box 1450
Klamath Falls, Or 97601
503-882-4656

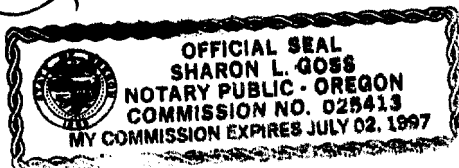
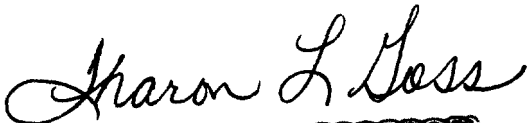


EXHIBIT E-1
ALLOCATION AND SPACING STUDY
KFLS (FM) CLASS C UPGRADE
July 14, 1993

A search of the FCC data base available July 12, 1993 shows that there are no other allocations or license FM broadcast stations or proposals that conflict with this rulemaking petition using the current transmitter site now in use by the petitioner. Enclosed is a copy of the channel search of channels 240 thru 246 plus channels 296 and 297.

In conclusion, channel 243 C can be allocated to Tulelake, California for use at the current transmitter site in full compliance with 73.207 (b) (1) of the rules.

Respectfully submitted by:



David Quinlan, Consulting Engineer
222-B Elm Ave.
Manteca, CA 95336
209-825-6854

Exhibit E-1

Dave Quinlan Consulting Engineer
Manteca, CA

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Jul 12, 1993

Constraints Study FM Channel 243C

Title: Tululake Upgrade
Reference City: Tululake, CA
Translators Are Not Included
Audit File: fms07133.A01

Latitude: 42-05-50
Longitude: 121-37-59
FCC Database: 930630

Call City of	Auth License	Licensee Name St	FCC File No.	Chan Freq	ERP-kW EAH-m	Latitude Longitude	Az-to -from	Dist (km)	Req (km)
<p>USED</p> <p>Susanville CA 242C3 96.3 40-26-55 120-44-20 157.5 338.1 197.83 21.83 176</p> <p>Site Restricted-Effective 10-12-90 Docket: 90-177</p>									
<p>KKLC CP Dale A. Ganske 242C3 25.0 40-27-21 154.1 202.22 176</p> <p>Susanville CA BPH-910204ME 96.3 100 120-35-18 334.8 26.22 CLEAR</p>									
<p>USED</p> <p>Eureka CA 242C 96.3 40-43-36 123-58-18 232.8 51.2 247.80 6.80 241</p> <p>Coordinates updated from LIC record BLH5918</p>									
<p>KFMI LIC Signal Associates 242C 30.0 40-43-36 232.8 247.80 241</p> <p>Eureka CA BLH-5918 96.3 482 123-58-18 51.2 6.80 CLEAR</p>									
<p>KFMI CP Signal Associates 242C 100. 40-43-36 232.8 247.80 241</p> <p>Eureka CA BPH-870302NJ 96.3 482 123-58-18 51.2 6.80 CLEAR</p> <p>CP cancelled 920805</p>									
<p>NEW CP Wynne Broadcasting Co 243C2 1.80 42-05-50 0.0 0.00 249</p> <p>Tululake CA BPH-920921MC 96.5 650 121-37-59 0.0 -249.0 SHORT</p> <p>Transmitter site is located on Stukel Mountain in Oregon.</p>									
<p>USED</p> <p>Tululake CA 243C2 96.5 41-57-24 121-28-30 140.1 320.2 20.37 -228.6 249</p> <p>Effective 9-8-92</p>									
<p>VACANT</p> <p>Bandon OR 243C3 96.5 43-00-30 124-25-30 294.8 112.9 250.65 13.65 237</p> <p>First Come/First Served Allotment Docket: 91-341</p> <p>Site restriction-Effective 9-8-92</p>									
<p>KTWI LIC Confederated Tribes, 243C 100. 44-50-24 5.9 306.45 290</p> <p>Warm Springs OR BLH-860127KG 96.5 332 121-13-56 186.2 16.45 CLEAR</p>									
<p>USED</p> <p>Warm Springs OR 243C 96.5 44-50-24 121-13-56 5.9 186.2 306.45 16.45 290</p> <p>Coordinates updated from LIC record BLH860127KG</p>									

Exhibit E-1

Dave Quinlan Consulting Engineer
Manteca, CA

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Jul 12, 1993

Constraints Study FM Channel 243C

Title: Tulalake Upgrade
Reference City: Tulalake, CA
Translators Are Not Included
Audit File: fms07133.A01

Latitude: 42-05-50
Longitude: 121-37-59
FCC Database: 930630

Call City of License	Auth St	Licensee Name FCC File No.	Chan ERP-kW Freq	ERP-kW EAH-m	Latitude Longitude	Az-to -from	Dist (km)	Req (km)
VACANT			244B1		39-57-29	181.7	237.66	193
Paradise	CA		96.7		121-42-50	1.6	44.66	CLEAR
Docket: 92-86								
USED			245C		42-22-56	283.7	139.15	105
Grants Pass	OR		96.9		123-16-29	102.6	34.15	CLEAR
Coordinates updated from LIC record			BLH860403KB					
KYJCFM LIC		Encore Broadcasting C	245C	25.0	42-22-56	283.7	139.15	105
Grants Pass		OR BLH-860403KB	96.9	679	123-16-29	102.6	34.15	CLEAR

End of Constraints Study FM Channel 243C